

EXHIBIT J

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DALE and JENNIFER HARRIS, as
Parents and next friend of their minor son,
RNH,

Plaintiffs,

v.

MARGARET ADAMS, KATHRYN
ROBERTS, RICHARD SWANSON,
NICOLE NOSEK, SUSAN PETRIE,
ANDREW HOEY, KAREN SHAW,
JOHN BUCKEY, and TOWN OF
HINGHAM SCHOOL COMMITTEE ,

Defendants.

C.A. NO.: 1:24-CV-12437-WGY

**AFFIDAVIT OF SUSAN PETRIE IN SUPPORT OF DEFENDANTS’
OPPOSITION TO MOTION FOR A PRELIMINARY INJUNCTION**

I, Susan Petrie, do hereby make the following affidavit under the pains and penalties of perjury:

1. My name is Susan Petrie. I am a Social Studies teacher at the Hingham High School (“HHS”).

2. I have personal knowledge about the policies of Hingham High School (“HHS”) concerning cheating, plagiarism and students’ use of Artificial Intelligence (“AI”) that were in place during the 2023-2024 school year.

3. [REDACTED] was a student in an Advanced Placement (“AP”) US History class that I taught during the 2023 – 2024 school years.

4. During September 2023, I assigned the students in AP US History an assignment in conjunction with National History Day. The assignment called for the students to jointly write

a paper or documentary script about a topic with a partner. The students were not required to work with a partner, and they had option of paper, documentary, or performance. This was a written assignment. The written assignment contained a link to the National History Day website and the rules for the project. The students were expected to follow the rules and guidelines from the National History Day website. The projects were eligible for submission to a national contest sponsored by National History Day.

5. I explained to the students in the AP US History Class that they could use AI to brainstorm about the topic for their project, but could not use AI for the content of their notes, script or final project. I also explained that all three (3) components of the project must be submitted to Turnitin.com, a plagiarism detection tool.

6. The National History Day project contained six (6) components overall – the topic proposal, research proposal, working bibliography, the notes, the script or first draft, and the final written project. For grading purposes, the notes were worth 20 points, the script was worth 30 points, and the final written project was worth 100 points.

7. RNH [REDACTED] prepared notes and documentary script, about civil rights leader and basketball hall of famer, Kareem Abdul-Jabbar. RNH [REDACTED] submitted the script to Turnitin.com. While the script submitted by RNH did contain some citations, it did not cite to Grammarly, or any other AI application, as a source of information.

8. Turnitin.com flagged the National History Day script submitted by RNH as generated by AI and highlighted the specific sections that were indicated to be AI-generated. I then used Google Classroom and ran the submission through the Chrome “Revision History” extension, a tool used by HHS’ ELA and Social Studies teachers to determine how many edits students made to their essays, how long students spent writing, and what portions of the work

were copied and pasted. I discovered that there were many large cut and paste items in RNH's script. I also ran the submission through two additional tools, Draft Back and Chat Zero, which also indicated that the submission was generated by AI.

9. I met with RNH after school in person on December 20, 2020 and showed him the results of the "Turnitin.com" and Chrome "Revision History" review of the National History Day. I informed him that I would be turning over the information to the K-12 Social Studies Director, Andrew Hoey ("Hoey"), for further review. I then informed Hoey about the suspected academic integrity violation.

10. Hoey and I met with RNH on December 21, 2023 to clarify RNH's statements around the use of AI that described during his initial meeting with me. RNH explained his process for generating his script using Grammarly and described the specific prompt that he put into Grammarly. RNH was very forthcoming in the second meeting. Hoey and I praised RNH for doing the right thing and admitting to his use of AI.

11. If I graded the notes and script as if AI was not used, I would have assigned the following grades to RNH: 17 out of 20 for the notes or a B and 24 out of 30 for script or a B minus.

12. For the final written submission, which RNH was allowed to submit for full credit, I assigned a grade of 65. This grade was not dependent on or influenced by the zeros given for the notes and script. RNH could have received full credit, or a letter grade of A plus, if the submission warranted such a grade. [REDACTED]

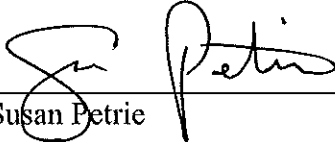
13. Overall, RNH's grade for the assignment, had he not received the zeros, would have been a B minus or an 81.5.

14. RNH's grade for the mid-term exam was a 76. The mid-term exam was weighted more than the National History Day project.

15. RNH's term grades for AP US History were as follows: term one (1) 84, term two (2) 63, term three (3) 84 and term four (4) 84.

16. If RNH was graded as if AI was not used on his National History Day assignment, his term for grade (2) would have been 77.

Signed under the pains and penalties of perjury this 17 day of October 2024.



Susan Petrie